

BILLY R. PESNELL
JOSEPH L. HARGROVE, JR.
DAVID L. SMELLEY
PAUL A. STRICKLAND
SCOTT C. SINCLAIR
W. BROOKS MAY
JASON C. FALUDI

OF COUNSEL
WILLIAM G. CONLY

HARGROVE, PESNELL & WYATT

(A PROFESSIONAL LAW CORPORATION)
AMERICAN TOWER, SUITE 600
401 MARKET STREET
SHREVEPORT, LOUISIANA 71101-3239

THOMAS J. WYATT (1942-1996)

MAILING ADDRESS
POST OFFICE BOX 59
SHREVEPORT, LOUISIANA 71161-0059
TELEPHONE (318) 429-7200
TELECOPIER (318) 429-7201

December 6, 2002

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
Post Office Box 44275
Baton Rouge, Louisiana 70804-4275

Re: APPLICATION FOR PUBLIC HEARING

Brown-Ozley Sand; Hosston B Zone, Reservoir A; and
Hosston C Zone, Reservoir A; BEAR CREEK FIELD,
Bienville Parish, Louisiana.

Dear Sir:

EL PASO PRODUCTION COMPANY ("Applicant") hereby respectfully applies for a public hearing to consider evidence relative to the issuance of Orders pertaining to the following matters relating to the Brown-Ozley Sand; the Hosston B Zone, Reservoir A; and to the Hosston C Zone, Reservoir A; in the Bear Creek Field, Bienville Parish, Louisiana:

1. To permit Applicant to drill, designate and utilize its El Paso Fee 3 No. 2 Well as an alternate unit well for BR-OZ SUBB at the location shown on an attached plat, in exception to the well location provisions of the Office of Conservation Order No. 78 series of Orders.
2. To permit Applicant to drill, designate and utilize its El Paso Fee 3 No. 2 Well as an additional alternate unit well for HOSS B RA SUZ at the location shown on an attached plat, in exception to the well location provisions of Office of Conservation Order No. 78-Q, effective February 18, 1971, and in lieu of the location approved by Office of Conservation Order No. 78-Q-72, effective May 23, 2001.
3. To permit Applicant to drill, designate and utilize its El Paso Fee 3 No. 2 Well as an additional alternate unit well for HOSS C RA SUJ at the location shown on an attached plat, in exception to the well location provisions of Office of Conservation Order No. 78-Y, effective September 11, 1980, and in lieu of the location approved by Office of Conservation Order No. 78-Y-29, effective May 23, 2001.
4. To find that drilling, designation and use of the proposed alternate unit well is necessary to efficiently and economically drain a portion of the Brown-Ozley Sand, the Hosston B

Zone, Reservoir A, and the Hosston C Zone, Reservoir A, underlying the units on which it is proposed to be drilled which cannot be efficiently and economically drained by any existing well within these units.

5. To permit the Operator of BR-OZ SUBB and HOSS C RA SUJ to produce the allowables assigned to these units from either the unit well, any alternate unit well, or from any combination of such wells, at the option of the Operator.

6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Brown-Ozley Sand in the Bear Creek Field, Bienville Parish, Louisiana, was defined in Office of Conservation Order No. 78-D, effective February 20, 1952.

The Hosston B Zone, Reservoir A, in the Bear Creek Field, Bienville Parish, Louisiana, was initially defined in Office of Conservation Order No. 78-Q, effective February 18, 1971, and was further defined in Office of Conservation Order No. 78-Q-8, effective July 6, 1982.

The Hosston C Zone, Reservoir A, in the Bear Creek Field, Bienville Parish, Louisiana, was defined in Office of Conservation Order No. 78-Y, effective September 11, 1980.

Pertinent data concerning this application is available for inspection at the offices of Louis Gilbert & Associates, Inc., 3636 N. Causeway Boulevard, Suite 204, Metairie, Louisiana 70002-7216. Any person desiring to inspect such data should call Mr. Gilbert at (504) 834-8112 during normal business hours in order to arrange a date and time for such inspection. A copy of any such pertinent data which is not otherwise available from the records of the Louisiana Office of Conservation can be obtained from Applicant at the expense of the requesting party.

As provided by the Revised Rules of Procedure, the subject matter of this application does not require the issuance of a pre-application notice; therefore, no such notice has been issued.

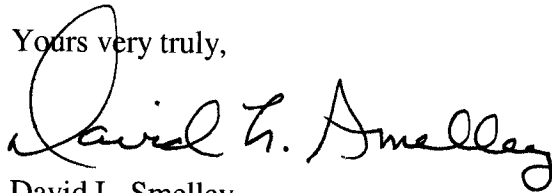
Pursuant to the aforesaid Rules of Procedure, Applicant has made a reasonable effort to obtain the names and addresses of all Interested Owners, Represented Parties and Interested Parties to whom notice of this application is being sent and has attached hereto a list of the names and addresses of such parties. A copy of this letter and of the three (3) attached plats is being sent to the District Manager of the Shreveport District of the Office of Conservation and to each of the Interested Owners, Represented Parties and Interested Parties shown on the attached list.

Honorable James H. Welsh
December 6, 2002
Page 3

Applicant will provide for posting of a copy of the Legal Notice of this hearing, and of the enclosed plats, at a prominent place in the area affected and will cause publication of the Legal Notice in a newspaper published in the general area of Bear Creek Field, all in accordance with the Revised Rules of Procedure. Furthermore, a copy of the Legal Notice will be mailed to all Interested Owners, Represented Parties and Interested Parties promptly upon receipt of the Legal Notice from the Commissioner.

A check payable to the Office of Conservation and covering the application fee is enclosed.

Yours very truly,

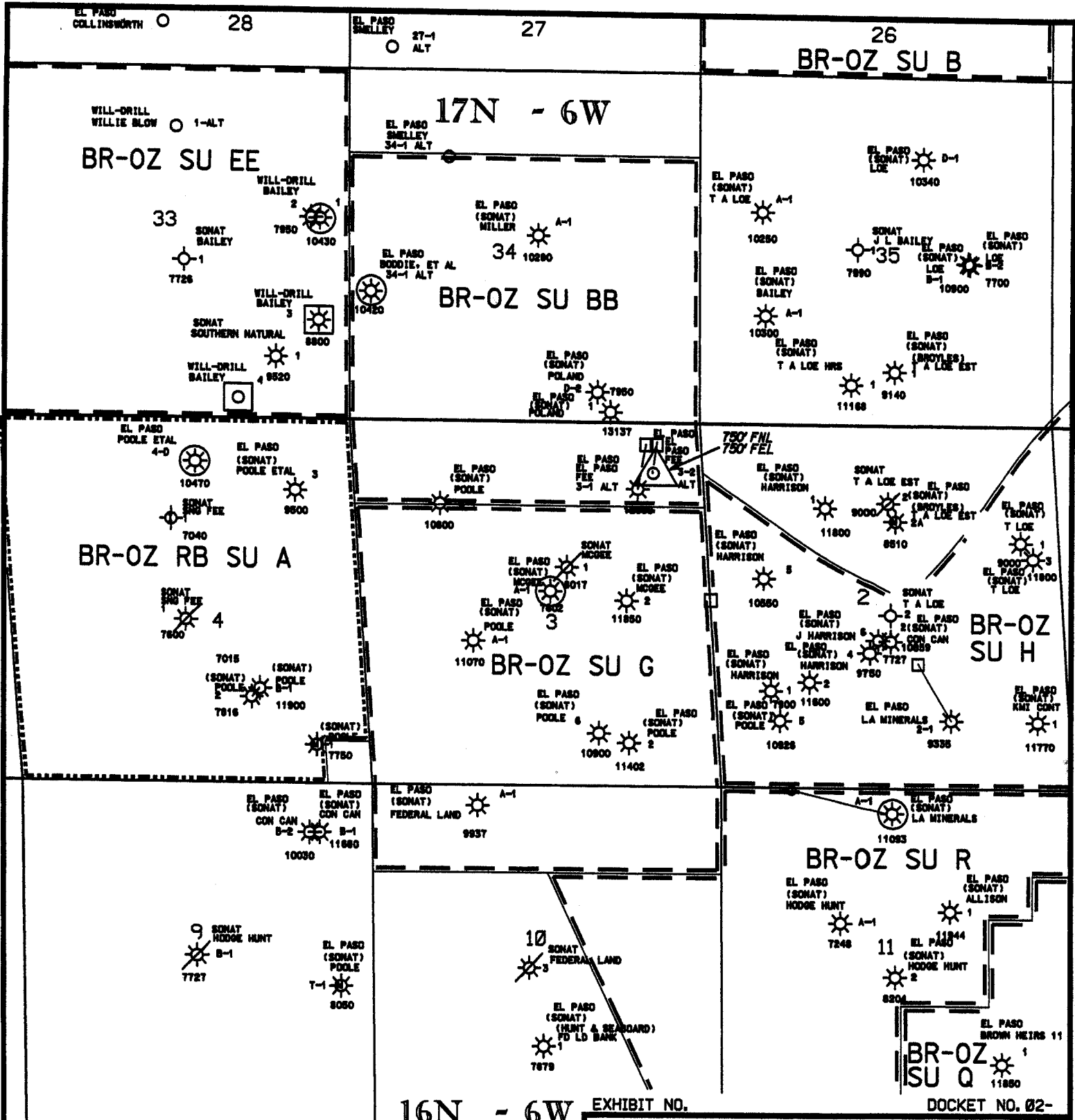


David L. Smelley

-- Attorney for El Paso Production Company

DLS:dp
Enclosures

cc: Mr. Jim Broussard (w/encls.)
Mr. Gary Griffith (w/encls.)
Mr. Jerry McAnulty (w/encls.)
Ms. Shirley Galik (w/encls.)
Mr. Louis Gilbert (w/encls.)
Interested Owners, Represented
Parties and Interested Parties (w/plats only)



16

LEGEND

--- BROWN-OZLEY SAND UNITS
AS PER 78 SERIES OF ORDERS

----- BR-OZ RB SU A, APO 78-V

○ UNIT WELL

□ ALTERNATE UNIT WELL

△ PROPOSED ALTERNATE UNIT WELL

15

16N - 6W

EXHIBIT NO.

DOCKET NO. 02-

el paso Production

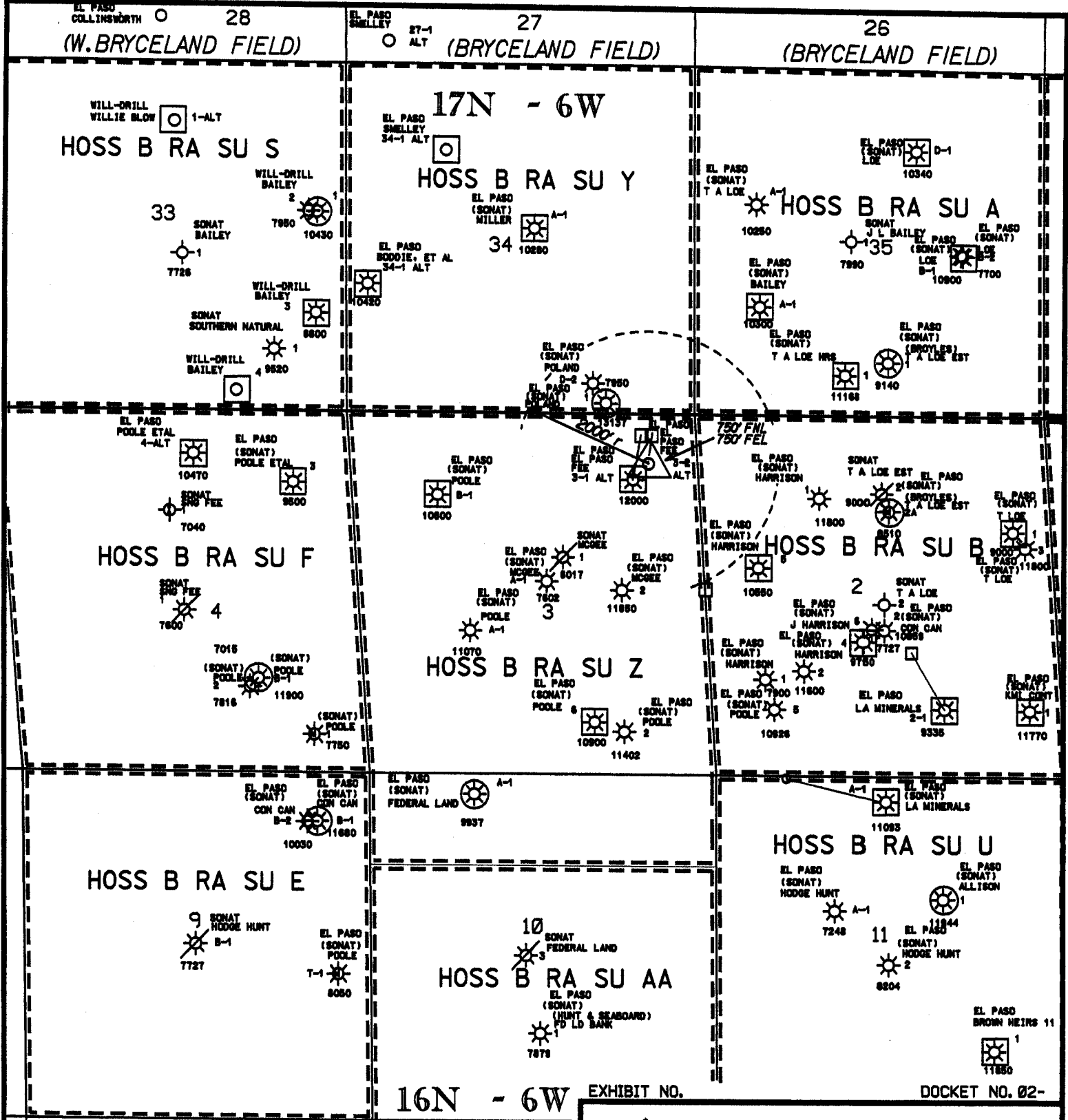
Onshore Development
Houston, Texas

BEAR CREEK FIELD
BIENVILLE PARISH, LOUISIANA

PROPOSED ALTERNATE UNIT WELL PLAT
BR-OZ SU BB

0 1000 2000 3000

LOUIS GILBERT & ASSOCIATES, INC.



16
LEGEND

HOSSTON B, RESERVOIR A, UNITS AS PER
78-0 SERIES OF ORDERS

- UNIT WELL
- EXISTING ALTERNATE UNIT WELL
- △ PROPOSED ALTERNATE UNIT WELL

WELLS 7200' OR SHALLOWER
REMOVED FROM BASE

EXHIBIT NO.

DOCKET NO. 02-



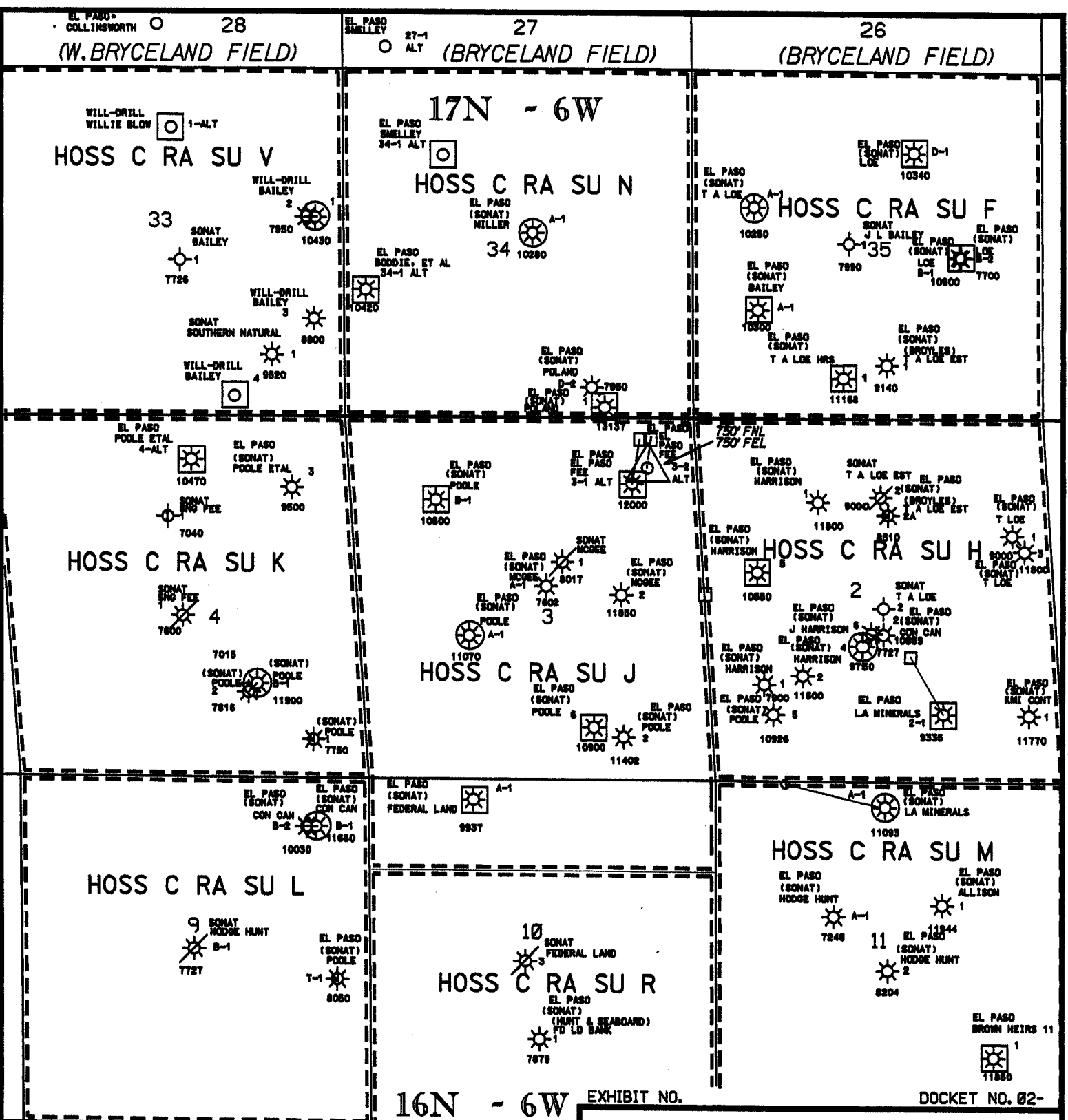
Onshore Development
Houston, Texas

BEAR CREEK FIELD
BIENVILLE PARISH, LOUISIANA

PROPOSED ALTERNATE UNIT WELL PLAT
HOSS B RA SU Z



LOUIS GILBERT & ASSOCIATES, INC.



16

LEGEND

HOSS C, RESERVOIR A, UNITS AS PER 78-Y SERIES OF ORDERS

○ UNIT WELL

□ EXISTING ALTERNATE UNIT WELL

△ PROPOSED ALTERNATE UNIT WELL

WELLS 7200' OR SHALLOWER REMOVED FROM BASE

15

EXHIBIT NO. DOCKET NO. 02-

eipaso Production Onshore Development Houston, Texas

BEAR CREEK FIELD
BIENVILLE PARISH, LOUISIANA

PROPOSED ALTERNATE UNIT WELL PLAT

HOSS C RA SU J

0 1000 2000 3000

LOUIS GILBERT & ASSOCIATES, INC.